

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

RYAN SCOVILLE

Plaintiff,

v.

U.S. DEPARTMENT OF STATE,

Defendant.

Case No. 2:22-cv-00091-NJ

**PLAINTIFF'S MOTION TO FILE DOCUMENTS AS RESTRICTED  
PURSUANT TO GENERAL L.R. 79(d)**

Pursuant to General Local Rule 79(d), and the Protective Order entered in this Case (ECF No. 32), Plaintiff Ryan Scoville hereby moves the Court for an Order to restrict access to the below-listed document, which was identified as “confidential” by Defendant during discovery, to case participants.

In support of this Motion, Plaintiff states as follows:

1. The parties have conferred for the purpose of “agree[ing] that the documents can be redacted to remove the Protected Material,” as required by paragraph 16 of the Protective Order.
2. The parties have not yet reached agreement as to this document.
3. The document is as follows:
  - a. Exhibit 70 attached to the Declaration of Tobin Raju in Support of Plaintiff’s Motion for Partial Summary Judgment, which is a report from the MITRE Corporation, titled “Department of State FOIA Program Vision,” dated June 15, 2017, and bearing the Bates Numbers SCO\_14234-SCO\_14280.

4. This document has been designated as “CONFIDENTIAL – Subject to Protective Order” by Defendants, pursuant to the terms of the stipulated Protective Order.

5. Plaintiff takes no view on the propriety of the confidentiality designations on this document.

WHEREFORE Plaintiff Ryan Scoville requests that the Court grant this Motion to permit the above-listed document to be filed under restriction to case participants.

Dated: February 18, 2025

/s/ Hunter Van Asten

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Respectfully submitted,

/s/ Tobin Raju

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